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June 7, 2005

By Courier and E-File

Caroline M. Bulger
Hearing Officer
Department of Telecommunications and Energy
One South Station, 2nd floor
Boston, MA 02202

Re: Bay State Gas Company, D.T.E. 05-27

Dear Ms. Bulger:

Enclosed for filing please find Motion of Bay State Gas Company to Respond to the Motions of Other Parties by June 10, 2005.

Very truly yours,

Robert L. Dewees, Jr.

RLD/tlm
Enclosure

cc: Mary L. Cottrell, Secretary
John Sullivan, DTE (7 copies)
Andreas Thanos, Assistant Director, Gas Division
Alexander Cochis, Assistant Attorney General (4 copies)

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Bay State Gas Company)
For Approval of Revised Tariffs)
And Other Rate Modifications)

D.T.E. 05-27

**MOTION OF BAY STATE GAS COMPANY
TO RESPOND TO THE MOTIONS OF OTHER PARTIES BY JUNE 10, 2005**

On June 2, 2005 the Attorney General filed a Motion to Bifurcate and a Motion for Depositions in this proceeding. On June 3, 2005 the Attorney General filed an Appeal to the Full Commission of Hearing Officer's Ruling on Intervention and Renewed Opposition to Full Party Status of KeySpan Energy Services New England and NStar Gas Company. On June 6, 2005 the Attorney General filed a Motion for Oral Argument Before the Commissioners.

On June 2, 2005 Local 273, Utility Workers Union of America, AFL-CIO filed a Notice of and Motion for Depositions.

Bay State Gas Company ("Bay State") requests that the Department permit it to respond to these pleadings by Friday, June 10, with the exception of the Motion for Oral Argument for which the Hearing Officer has given parties five business days to respond.

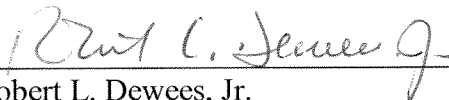
In response to the Hearing Officer's directive made at the procedural conference held on June 2, Bay State and its counsel have devoted virtually all of their time and effort since then to responding to the Attorney General's outstanding information requests, as well as the Department's outstanding requests. Given the number of pleadings that have been filed by parties, and in order that Bay State reply fully to those pleadings, Bay State requests that it be

permitted to respond by June 10. It is within the Hearing Officer's authority to allow this request. 220 C.M.R. 1.04(5)(d).

Respectfully submitted,

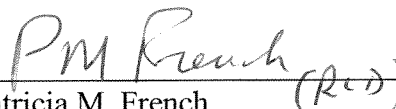
BAY STATE GAS COMPANY

By its attorneys,



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Dated: June 7, 2005